

REMARKS

This is in response to the Office Action mailed on January 25, 2005. Claims 1-16 were pending in that application and all claims were rejected. With the present response, claims 1, 6 & 12 are amended. The remaining claims are unchanged.

On page 2 of the Office Action, the Examiner rejected claims 1-16 under 35 U.S.C. §102(b) as being anticipated by U.S. Patent No. 5,510,981 to Berger et al. (hereinafter referred to as "the Berger reference" or "the cited reference"). For reasons that will be outlined in detail below, it is respectfully submitted that Applicant's claims are patentably distinguishable from the cited reference.

Applicant's claims all incorporate "linguistic patterns" into a method or system for translation. The specification associated with the present application describes the nature of the claimed linguistic patterns at least with reference to FIGS. 4A and 4B on page 13 through the top of page 14. A linguistic pattern set is specifically depicted in FIG. 4B, wherein each linguistic pattern objectively represents a different grouping of translation components. A single phrase in a first language (such as phrase E in FIGS. 4A and 4B) is mapped to a corresponding plurality of linguistic patterns in a second language (such as the pattern set in FIG. 4B). As is indicated in FIG. 2, the linguistic patterns are derived from a bi-lingual corpus and stored in a specialized data store.

With the present amendment, each independent claim (1, 6 and 12) has been amended to emphasize that incorporation of linguistic patterns into the translation system or process is an incorporation of patterns that each represent a grouping of components relative to a phrase that is being translated.

The cited reference describes a translation environment in which "at least two target hypotheses" are generated, where each target hypothesis comprises "a series of [target] words"

(ABSTRACT). A match score is generated for each target hypothesis, the match score including value given to a language model comparison component, as well as to a "word match" score (ABSTRACT). However, at no point does the cited reference teach or suggest any incorporation of any input remotely similar to a linguistic pattern that represents a grouping of components relative to a phrase to be translated. The described input of a "target hypothesis" is a series of words and is not a grouping pattern. Accordingly, it is respectfully submitted that Applicant's independent claims 1, 6 and 12 are in allowable form at least for this reason.

It is also worth pointing out that the process described in the Berger reference of generating a word match score, and eventually a translation match score, is similar to Applicant's utilization of a translation model 216 (FIG. 2 and p. 12) to provide a probability of translation of a word in a first language (e.g., English) to a word in a second target language (e.g., Chinese). However, Applicant's disclosed and claimed translation embodiments incorporate an additional, entirely separate factor in the form of related linguistic patterns that represent objective groupings of components relative to a phrase to be translated. As Applicant has both disclosed and claimed, patterns of this type are, in one embodiment, assigned a probability value that is factored into an output determination.

The cited reference simply neither teaches or suggests such incorporation of linguistic pattern information into the determination of a match score.

It is respectfully submitted that all of Applicant's dependent claims (2-5, 7-11 and 13-16) are in allowable form at least for the same reasons outlined above in relation to the related independent claims. It is further submitted, however, that many of the dependent claims recite additional features that are neither taught nor suggested by the cited reference. For

example, claim 2 recites identifying a linguistic pattern as "indicative" of a likely phrase translation. Claim 3 recites providing an output "based on the linguistic pattern identified".

Claim 4 recites "accessing a bilingual data store that includes linguistic patterns". Even more notably, claim 5 recites "calculating a pattern probability" for a linguistic pattern. Dependent claims 7-11 and 13-16 similarly teach specific embodiments incorporating linguistic pattern information. It is respectfully submitted that the dependent claims of the present application are in allowable form for all of these additional reasons.

In summary, it is respectfully submitted that claims 1-16, as presently amended, are in allowable form. Consideration and favorable action are respectfully solicited. The Director is authorized to charge any fee deficiency required by this paper or credit any overpayment to Deposit Account No. 23-1123.

Respectfully submitted,

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